

# EXHIBIT E

**From:** petersjoan petersjoan@bellsouth.net

**Subject:** Re: Bonnell / Doe

**Date:** September 29, 2025 at 12:39 PM

**To:** Andrew Brettler abrettler@berkbrettler.com

**Cc:** Carlos Garcia Perez cgarciaperez@smgqlaw.com, Gustavo D. Lage glage@smgqlaw.com, Andrea Garcia agarciaw2@gmail.com, Angie Velando angie@smgqlaw.com, Robert "Bob" L. Raskopf rraskopf@bilzin.com, Patricia M. Patino ppertino@bilzin.com, Jake Camara jcamara@berkbrettler.com, Joel Sichel jsichel@berkbrettler.com, Regina Peter rpeter@berkbrettler.com, Maria Favela mfavela@berkbrettler.com

Attached please find a Notice of Deposition for defendant's deposition on Nov 6th. Plaintiff can be available in Miami on November 21st for her deposition.

Regards,  
Joan

On Friday, September 26, 2025, 12:21:16 PM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

Thank you Joan. Let's hold November 6 for Mr. Bonnell's deposition in Miami.

If your client is not available for deposition in Miami during the entire month of November, please provide us with her availability to sit for deposition in Miami in October.

Sincerely,

**Andrew B. Brettler** | BERK BRETTLER LLP  
9119 W. Sunset Blvd. | West Hollywood, CA 90069  
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On Sep 26, 2025, at 7:53 AM, petersjoan <petersjoan@bellsouth.net> wrote:

We would like to depose your client in Miami on November 5 or 6. Please confirm availability. Our client will be in Illinois, not Miami, in November. She is available to be deposed remotely or in person in Illinois on November 14.

thanks,  
Joan

On Monday, September 22, 2025, 10:46:01 AM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

Our client is generally available during the week of Nov. 3. With the exception Nov. 4 (I have a court hearing in another matter), we will endeavor to make Mr. Bonnell available for deposition any day that week. While we are in Miami, let's also set Plaintiff's deposition for the same week. Please let us know what works for you and her. Thank you.

Sincerely,

**Andrew B. Brettler** | BERK BRETTLER LLP  
9119 W. Sunset Blvd. | West Hollywood, CA 90069  
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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Miami Division

**JANE DOE,**

Case No: 1:25-cv-20757-JB/Torres

Plaintiff,

vs.

**STEVEN K. BONNELL II,**

Defendant.

\_\_\_\_\_ /

**PLAINTIFF'S NOTICE OF DEPOSITION OF STEVEN K. BONNELL II**

**PLEASE TAKE NOTICE** that on **November 6, 2025**, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, Plaintiff will take the deposition of the defendant Steven K. Bonnell II at the offices of Sanchez-Medina, Gonzalez, Lage, Gomez & Machado, LLP, 201 Alhambra Circle, Suite 1205, Coral Gables, Florida, upon oral examination before Veritext Court Reporting, or any other Notary Public or officer authorized by law to take depositions in the State of Florida. The deposition will commence at 10:00 a.m. eastern time and continue from day to day until completed. The deposition will be recorded by stenographic means.

WE HEREBY CERTIFY that on this same date, a true and exact copy of the foregoing Notice of Taking of Deposition Pursuant to Rule 30(b)(1) was sent via e-mail to all counsel of record.

In Miami, Florida, this 29<sup>th</sup> day of September, 2025.

DOE v BONNELL

Case No: 1:25-cv-20757-JB/Torres

Respectfully submitted,

**JSP LAW, LLC**

Joan Schlump Peters

(admitted *pro hac vice*)

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Counsels for Plaintiff JANE DOE



By: \_\_\_\_\_  
CARLOS A. GARCIA PEREZ